

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MICHAEL GONIDAKIS, MARY PARKER,  
MARGARET CONDITT, BETH  
VANDERKOOI, LINDA SMITH,  
DELBERT DUDUIT, THOMAS W. KIDD  
JR., DUCIA HAMM,

Plaintiffs,

BRIA BENNETT, REGINA C. ADAMS,  
KATHLEEN M. BRINKMAN, MARTHA  
CLARK, SUSANNE L. DYKE, MERYL  
NEIMAN, HOLLY OYSTER, CONSTANCE  
RUBIN, EVERETT TOTTY,

Intervenor-Plaintiffs,

v.

FRANK LAROSE, in his capacity as Ohio  
Secretary of State,

Defendant.

Case No. 2:22-cv-00773

Judge Amul R. Thapar  
Judge Algenon L. Marbley  
Judge Benjamin J. Beaton

**NOTICE OF CORRECTION**

Intervenor-Plaintiffs Bria Bennett, Regina C. Adams, Kathleen M. Brinkman, Martha Clark, Susanne L. Dyke, Meryl Neiman, Holly Oyster, Constance Rubin, and Everett Totty (the “Bennett Petitioners”) submit this notice of correction to their Post-Hearing Brief Regarding Plaintiffs’ Motion for a Preliminary Injunction, ECF No. 161.

As explained in the attached Supplemental Declaration of Dr. Rodden, the Corrected Independent Map Drawers’ Plan data files that were submitted with the Bennett Petitioners’ April 6 brief contain two minor errors, which have since been corrected.

Additionally, the Corrected Independent Map Drawers’ Plan data files that were submitted with the Bennett Petitioners’ April 6 brief retained the same numbering scheme that the

Independent Map Drawers themselves used, to allow for an apples-to-apples comparison. For the same reason, Dr. Rodden's Supplemental Declaration also refers to districts using their original numbering in the Independent Map Drawers' Plan. The Corrected Independent Map Drawers' Plan submitted alongside this Notice finalizes the numbering of House Districts in accordance with Article XI, Section 3(C) of the Ohio Constitution, which provides as follows:

(C) House of representatives districts shall be created and numbered in the following order of priority . . . :

(1) Proceeding in succession from the largest to the smallest, each county containing population greater than one hundred five per cent of the ratio of representation in the house of representatives shall be divided into as many house of representatives districts as it has whole ratios of representation. Any fraction of the population in excess of a whole ratio shall be a part of only one adjoining house of representatives district.

(2) Each county containing population of not less than ninety-five per cent of the ratio of representation in the house of representatives nor more than one hundred five per cent of the ratio shall be designated a representative district.

(3) The remaining territory of the state shall be divided into representative districts by combining the areas of counties, municipal corporations, and townships. Where feasible, no county shall be split more than once.

The following table sets forth the original House District numbers (left) shaded in gray and the final House District numbers (right) in bold. Senate District numbers were correct in the original.

Original	Final	22	20	38	40	66	60	52	80
1	1	23	21	43	41	67	61	56	81
2	2	24	22	44	42	68	62	69	82
3	3	13	23	46	43	71	63	83	83
4	4	31	24	45	44	70	64	84	84
5	5	25	25	48	45	72	65	85	85
6	6	26	26	49	46	73	66	86	86
7	7	27	27	50	47	76	67	87	87
8	8	28	28	47	48	77	68	88	88
9	9	29	29	53	49	79	69	89	89
10	10	30	30	54	50	78	70	90	90
11	11	35	31	55	51	37	71	91	91
12	12	32	32	64	52	36	72	92	92
15	13	33	33	58	53	80	73	93	93
16	14	34	34	59	54	81	74	94	94
17	15	75	35	57	55	97	75	95	95
18	16	39	36	62	56	82	76	96	96
19	17	40	37	63	57	60	77	74	97
20	18	41	38	14	58	61	78	98	98
21	19	42	39	65	59	51	79	99	99

The Corrected Independent Map Drawers' Plan submitted alongside this Notice may be viewed on "Dave's Redistricting App," a free website, at the following links:

- Corrected Independent Map Drawers' Plan – House: <https://davesredistricting.org/maps#viewmap::0f491073-dc37-44d5-818a-0be53d16db0f>.
- Corrected Independent Map Drawers' Plan – Senate: <https://davesredistricting.org/maps#viewmap::b1fb3054-ff7e-4490-8490-9301c2cc924e>.

Respectfully submitted,

/s/ Donald J. McTigue

Donald J. McTigue\* (OH 0022849)

*\*Counsel of Record*

Derek S. Clinger (OH 0092075)

MCTIGUE COLOMBO & CLINGER LLC

545 East Town Street

Columbus, OH 43215

T: (614) 263-7000

F: (614) 368-6961

dmctigue@electionlawgroup.com

dclinger@electionlawgroup.com

Abha Khanna\*\*

Ben Stafford \*\*

ELIAS LAW GROUP LLP

1700 Seventh Ave, Suite 2100

Seattle, WA 98101

T: (206) 656-0176

F: (206) 656-0180

akhanna@elias.law

bstafford@elias.law

David R. Fox\*\*

Jyoti Jasrasaria\*\*

Spencer W. Klein\*\*

Harleen Gambhir\*\*

Raisa Cramer\*\*

ELIAS LAW GROUP LLP

10 G St NE, Suite 600

Washington, DC 20002

T: (202) 968-4490

F: (202) 968-4498

dfox@elias.law

jjasrasaria@elias.law  
sklein@elias.law  
hgambhir@elias.law  
rcramer@elias.law

\*\* Admitted pro hac vice

*Counsel for Bennett Petitioners*

**CERTIFICATE OF SERVICE**

This is to certify a copy of the foregoing was served upon all counsel of record by means of the Court's electronic filing system on this 8th day of April, 2022.